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10 Attorneys for Plaintiff JENS ERIK SORENSEN,  
11 as Trustee of SORENSEN RESEARCH AND  
DEVELOPMENT TRUST

12  
13 UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15

16 JENS ERIK SORENSEN, as Trustee of	) Case No. CV 075525 JSW
17 SORENSEN RESEARCH AND	)
18 DEVELOPMENT TRUST,	) <b><u>RENEWED</u></b>
	) <b>REQUEST FOR ENTRY OF</b>
19 Plaintiff	) <b>DEFAULT and DEFAULT</b>
20 v.	) <b>JUDGMENT AGAINST</b>
	) <b>DEFENDANT FIRST</b>
21 FIRST INTERNATIONAL DIGITAL,	) <b>INTERNATIONAL DIGITAL, INC.</b>
22 INC. an Illinois corporation; and DOES 1-	)
23 100,	)
	)
24 Defendants.	)

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26 TO THE CLERK:

27 PLAINTIFF Jens Erik Sorensen, as Trustee of Sorensen Research and  
28 Development Trust ("SRDT") hereby requests the clerk to enter DEFENDANT First

1 International Digital, Inc.'s ("FID") default pursuant to Fed.R.Civ.P. Rule 55(a) and  
2 (b).

3 On November 9, 2007, Defendant FID was served by certified mail pursuant  
4 to Fed.R.Civ.P. Rule 4 and *California Code of Civil Procedure* § 415.40. Pursuant  
5 to statute, the effective date of service when certified mail service is accomplished is  
6 10 days after the date of mailing, or November 19, 2007. Plaintiff has filed an  
7 Amended Proof of Service of the Summons and Complaint attaching copies of the  
8 certified mail receipt and the delivery confirmation letter from the United States  
9 Post Office.

10 Defendant FID's responsive pleading was due on or before December 10,  
11 2007. No responsive pleading was filed, thereby placing FID in default.  
12 Furthermore, Plaintiff was advised by counsel for FID that no responsive pleading  
13 would be filed. See Affidavit of Melody A. Kramer, paragraph 4.

14 Furthermore, Plaintiff's claim is for a sum certain and is supported herewith  
15 by an Affidavit of Plaintiff's counsel, Melody A. Kramer, thereby allowing the  
16 Clerk to enter judgment for that amount and costs.

17 WHEREFORE, Plaintiff requests the Clerk to (1) enter default against  
18 Defendant First International Digital, Inc.; and (2) to enter judgment in favor of  
19 Plaintiff and against Defendant First International Digital, Inc., in the amount of  
20 One Million Five Hundred Thousand Dollars (\$1,500,000.00), plus costs of  
21 \$356.96, plus reasonable attorney fees of \$2,512.50.

22 DATED this 4<sup>th</sup> day of January, 2008.

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24 JENS ERIK SORENSEN, as Trustee of  
25 SORENSEN RESEARCH AND DEVELOPMENT  
26 TRUST, Plaintiff

27 /s/ Melody A. Kramer

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Melody A. Kramer, Esq.  
Attorney for Plaintiff